

U.S. DISTRICT COURT - N.D. OF N.Y.
FILED
OCT 10 2024
AT ____ O'CLOCK
John M. Domurad, Clerk - Plattsburgh

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Northern District of New York

UNITED STATES OF AMERICA)
v.)
BHUPINDER SINGH,)
Defendant.)

Case No. 8:24-MJ-464 (GLF)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of October 6, 2024, in the county of Franklin in the Northern District of New York the defendant violated:

Code Section

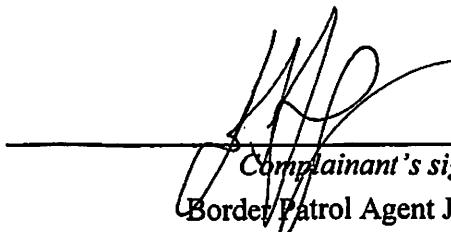
8 U.S.C. § 1325(a)(2)

Offense Description

The defendant, an alien and citizen of India, unlawfully eluded examination and inspection by Immigration officials by entering the United States at a place not authorized for the entrance of immigrants.

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Border Patrol Agent John Hanley

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: 10/10/24
GE



Judge's signature

City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

This criminal complaint is based on these facts:

On or about Saturday, October 5, 2024, Border Patrol Agents (BPA) from the Massena Border Patrol Station (MNB) were operating within the Massena Border Patrol's area of responsibility, specifically, Fort Covington, New York. Over the past two years, BPAs have noted a large number of undocumented immigrants utilizing Fort Covington to further their entrance into the United States. BPAs have apprehended individuals from numerous different countries in Fort Covington recently.

At approximately 9:30pm, Swanton Sector Border Patrol Communications advised that Royal Canadian Mounted Police (RCMP) stated they had observed two individuals walking south towards the international boundary line of the United States and Canada. Unmarked BPAs responded to the area and at approximately 11:15pm, observed a light blue Toyota van bearing NY license plate LNL5304 at the East End gas station in Fort Covington, NY. The East End gas station closes at 10:00 p.m. BPAs know, based on their experience, that the East End gas station has been used previously as a meeting place where individuals pick up illegal aliens and transport them away from the area further into the United States.

Unmarked BPAs observed the Toyota van drive from the gas pumps to a parking spot on the east side of the convenience store then move again to a nearby building approximately 50ft away that is under construction. At this point, an employee of the recently closed gas station notified the unmarked BPAs that he had observed several people get into the Toyota van. The BPAs notified marked units of this activity via service radio, relaying that the Toyota van had picked up several people and was now driving southbound on State Route 37 leaving the area.

At approximately 11:30pm, marked BPAs observed the Toyota van drive past their location and began following it for approximately five miles. During this time, BPAs observed the Toyota van fail to maintain its lane of travel and varying its speed, between approximately 45 and 53 mph. The speed limit on this road is 55 mph. BPAs know, based on their training and experience, that these driving characteristics usually occur when a driver is nervous and focuses more on the law enforcement presence behind them than driving.

At this time, BPAs conducted a vehicle stop on State Route 37 near County Route 4 in Westville, NY. As BPAs approached the vehicle, they observed several individuals laying on the rear floor of the Toyota van, attempting to conceal themselves. The driver, later identified as MIRIDHA, MD Fariaj, stated that he picked up his relative at the gas station after she crossed from Canada.

MIRIDHA stated that he picked up everyone at the gas station. BPAs questioned the six passengers for passports or identification, and none were in possession of documents to be, enter, or remain in the United States. At this time, BPA placed all six subjects and MIRIDHA under arrest and transported them to the Massena Border Patrol Station for further investigation.

At the station, agents conducted interviews, one of the passengers identified as Bhupinder SINGH stated that he and the four passengers from India had recently crossed from Canada prior to getting picked up by the Toyota van at the East End gas station. SINGH stated that he was supposed to pay the driver \$1000 once he reached New York City. Three out of the five subjects that were picked up were in possession of approximately \$2500 or more in Canadian currency and lower amounts of U.S currency.